



Thomas E. Preston  
Chief Executive Officer

September 27, 2013

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Attention: Chief – Wireline Competition Bureau

**Re: WC Docket No. 10-90**  
**Connect America Fund Phase I Round 2 Support Challenges**

Dear Ms. Dortch:

Duo County Telephone Cooperative Corporation, Inc. ("Duo County") hereby files these challenges to Windstream Corporation's ("Windstream") request to receive support in the second round of the Connect America Fund Phase I ("CAF Phase I Round 2") to provide broadband service to locations within the census blocks on the attached list. Duo County currently provides or can provide within 7-10 days broadband service at or above 3 Mbps download, 768 kbps upload in the census blocks identified on the attached list. Duo County respectfully requests that the Wireline Competition Bureau take into consideration the evidence provided herein as it makes its final determinations about which census blocks are ultimately eligible to receive CAF Phase I Round 2 support.

On August 28, 2013, the Federal Communications Commission ("FCC") released a Public Notice (DA 13-1832) which instructed interested parties "to challenge price cap carrier's Phase I deployment plans by demonstrating that a block in question is already served by fixed Internet access with the requisite speeds."<sup>1</sup> The Public Notice included a list of all census blocks that the price cap carriers are requesting to receive CAF Phase I Round 2 support to provide broadband. Duo County has reviewed this list and identified census blocks that should not be eligible for CAF Phase I Round 2 support.

Duo County hereby certifies under penalty of perjury that it provides or can provide within 7-10 days broadband in the census blocks included in Attachment A. Moreover, these census blocks are located wholly within Duo County's study area thereby making Windstream ineligible to receive CAF Phase I Round 2 support.

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<sup>1</sup> Wireline Competition Bureau Publishes Census Blocks, and Commences Challenge Process, for Second Round of Connect America Fund Phase I WC Docket No. 10-90, Public Notice, DA 13-1832 (rel. August 28, 2013) ("*August 28 Public Notice*").

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Sincerely,

A handwritten signature in blue ink, appearing to read 'T.E. Preston', with a long horizontal flourish extending to the right.

Thomas E. Preston  
Chief Executive Officer

cc: Ryan Yates  
Wireline Competition Bureau, Telecommunications Access Policy Division

Attachments

## **ATTACHMENT A**

The following census blocks are identified in the August 28, 2013 Public Notice as census blocks that Windstream is requesting CAF Phase I Round 2 support for the deployment of broadband, which Duo County challenges and urges the FCC to determine that these census blocks are ineligible for CAF Phase I Round 2 support as they are located wholly within Duo County's study area.

210019704011063  
210019704011068  
210019704011073  
212079601011001  
212079601011002  
212079601011004  
212079601011005  
212079601011010  
212079601011011  
212079601011013  
212079601011014  
212079601011059  
212079601011060  
212079601023000  
212079601023002  
212079601023005  
212079601023006  
212079601023007  
212079601023008  
212079601023025  
212079601023049  
212079601023050  
212079601023051  
212079601024027